

EXHIBIT C

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May 7, 2014

By Email (starbutton@cozen.com)

Scott Tarbutton, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103

Re: In re Terrorist Attacks on September 11, 2001
03 MDL 1570 (GBD) (FM)
Yassin Abdullah Kadi

Dear Scott:

I am writing to follow up on my December 12, 2013 letter to you and your January 17, 2014 letter in response.

Now that we have a cut-off for document production at the end of next month, I would like to establish a time by which Plaintiffs asserting claims against Mr. Kadi will respond to our Interrogatories, dated September 30, 2013. As I noted in previous correspondence, Judge Maas has ordered that NCB's contention interrogatories be responded to (see File Documents 2037 and 2060). Contention interrogatories are particularly called for in the case of Mr. Kadi where, despite Plaintiffs' production of thousands of pages of material, it remains impossible to discern a factual basis for any claim of personal jurisdiction over him.

Also, since we have not received any documents from you since the single production you made on November 11, 2013 (apart from disks with documents produced to other defendants), I would appreciate your re-confirming that Plaintiffs are not withholding any documents based on the assertion that Mr. Kadi's document requests are "essentially disguised contention interrogatories." Indeed, assuming that Plaintiffs have no additional responsive documents to produce, I ask that Plaintiffs comply with Judge

Scott Tarbutton, Esq.

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Maas's direction at the December 20, 2013 conference that each party comply with proposed Federal Rule 34 (b) (2) (C) ("An objection must state whether any responsive materials are being withheld on the basis of that objection"), and supplement each of your objections (other than privilege objections) with that information. Of course, Peter and I intend to provide that information with respect to Mr. Kadi's objections to Plaintiffs' document requests, but are not yet in a position to do so since we are still reviewing documents and preparing them for production.

On a related note, I want to let you know that we do not intend to produce another tranche until our final one on or about June 30. This is because a tranche production is time-consuming and we want to devote all our resources to our efforts at accomplishing a full production by June 30.

Sincerely,



Amy Rothstein

cc by email: Robert Haefele, Esq.
Defense Counsel